

Dear Allegra,

In follow-up to our correspondence last week, below is our response to your inquiry, which you can attribute to me directly.

"We are in this business because we care deeply and are dedicated to helping children who come from very challenging situations. Many members of our management team have spent their entire careers working directly with or on behalf of kids in the foster system.

As you have pointed out in your extensive coverage of the welfare system, it doesn't operate as well as it should. It's under-resourced, with far more demand for services than access to care. According to the National Child Abuse and Neglect Data System, in 2016 an average of approximately five children per day died from abuse or neglect, a 7.4% increase from 2012. Many children we serve are court mandated to our programs after the system has failed them at multiple previous points. By the time they reach us, they've experienced significant traumas.

We work diligently to ensure that we are providing the best care possible for our students, including continually improving our policies and procedures. If we identify a problem in our organization, we self-report it and make the appropriate correction immediately. The safety of the students in our care is our primary focus each and every day. Our practices have evolved over the years to keep pace with changes in best practices in the field. We emphasize de-escalation both with our staff and our students. It is our policy to only use restraints as an emergency safety intervention in two situations, where a student is a threat to himself or others, and in those cases to use the minimal level of intervention possible.

The Iowa Department of Human Services' most recent report on Clarinda, dated November 2018, concluded that our use of restraints as an emergency safety intervention were all appropriate and were consistently utilized for the safety of the students and people around them. As part of that investigation, Iowa DHS interviewed a large sample size of the staff and student population at Clarinda, including students from each of our dormitories, as well as research into the files of students who had an emergency safety intervention. The report includes evidence of appropriate staff training, policies and procedures, proper implementation, and the demonstrated ability to address concerns expeditiously.

Clarinda and the other two programs you reference all have their full licensure status. As a behavioral health organization, we are subject to constant monitoring by state regulatory and licensing oversight bodies, as well as The Joint Commission. Our facilities each receive dozens of on-site assessments per year, including many unannounced visits. In addition to these oversight authorities, students receive regular, required child welfare checks from their families and case workers/foster care agencies, who meet with students directly.

We don't just rely on these hundreds of outside evaluation touch points. We have internal quality control and rigorous training to ensure that the care and support we provide our students is consistent with all best practices and reaches our own high standards of respect for our students' dignity. We are proud of our level of transparency, the excellent treatment we deliver and the opportunity for success that we provide to every student."

Sincerely,

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